

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 1997

Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
BRADLEY E. PAFFORD (NAA/USPS-T1-1)
September 15, 1997**

The Newspaper Association of America hereby submits the attached interrogatory to United States Postal Service witness Bradley E. Pafford and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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By:




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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

September 15, 1997


William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
BRADLEY E. PAFFORD (NAA/USPS-T1-1)

NAA/USPS-T1-1: Please refer to page 3, lines 9-11 of your testimony.

- a. Please provide the basis for your statement that there is a "statutory requirement" that each class of mail be priced so as to cover its volume variable costs, as opposed to any other measure of costs.
- b. Have you consulted the testimony of witnesses Panzar or Takis to determine whether they agree with your statement?
- c. Please describe your qualifications to express an opinion as to how the term "attributable" in section 3622(b)(3) of the Postal Reorganization Act should be interpreted.